

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

DALE YLITALO, individually and on behalf  
of all others similarly situated,

*Plaintiff,*

v.

AUTOMATIC DATA PROCESSING, INC.,  
ADP, INC., and AMERICAN CENTURY  
INVESTMENT SERVICES, INC.,

*Defendants.*

Case No. 2:24-cv-07635-JKS-LDW

Hon. Jamel K. Semper, U.S.D.J.

Hon. Leda D. Wettre, U.S.M.J.

**DECLARATION OF MARGARET MURPHY**

I, **MARGARET MURPHY**, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a citizen of the United States and am over the age of 21.
2. I have been employed by American Century Investment Services, Inc. (“American Century”) since 1987. Throughout my employment by American Century, my responsibilities have focused upon retirement plans. My current job title with American Century is Business Consultant III, a position I have held since February 16, 2022. My responsibilities in this position are concentrated on SIMPLE IRA plans and, in the discharge of those responsibilities, I have access to client retirement plan information and client account statements.
3. I have personal knowledge of the facts set forth in this Declaration and could testify competently to those facts.
4. The rate of return experienced in Mr. Ylitalo’s SIMPLE IRA account since the initial contribution was made to that account on August 17, 2023, through and including July 24,

2025 is 12.3%.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 25th day of July, 2025, in Kansas City, Missouri.

*Margaret Murphy*

Margaret Murphy (Jul 25, 2025 09:47:40 CDT)

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Margaret Murphy